

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

MAYOR AND CITY COUNCIL OF  
BALTIMORE, *et al.*,

Plaintiffs,

vs.

ACTELION PHARMACEUTICALS LTD.,  
*et al.*,

Defendants.

Case No. 18-cv-3560-GLR

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Pursuant to Federal Rules of Civil Procedure 16(b)(4) and 29(b) and this Court's Amended Scheduling Order dated June 17, 2021 (Dkt. No. 72), Plaintiffs Mayor and City Council of Baltimore and Government Employees Health Association ("Plaintiffs") and Defendants Actelion Pharmaceuticals Ltd., Actelion Pharmaceuticals US, Inc., and Janssen Research & Development, LLC ("Defendants") hereby jointly submit the following:

1. On June 17, 2021, this Court ordered that discovery be substantially completed by October 29, 2021, and that all discovery be completed by January 31, 2021. (Dkt. No. 72).
2. The Parties are making diligent efforts to come to agreement on the appropriate protocols to obtain full and complete discovery in this case. To that end, the Parties have reached agreement on a Protective Order, (Dkt. No. 80) and search terms and custodians for the collection of documents responsive to the Parties' initial Requests for Production of Documents, and have made significant progress towards agreement on electronic search and privilege log protocols, and the scope of discovery relating to the Parties' initial Requests for Production.

3. Despite their diligent efforts, the Parties agree that additional time is needed to obtain full and complete fact discovery beyond the time contemplated by the June 17, 2021 Scheduling Order. With all other deadlines in the Scheduling Order contingent on the completion of fact discovery, the Parties also seek to amend all remaining deadlines in the Scheduling Order.

4. A jointly proposed Amended Scheduling Order is attached, which the Parties have discussed and consider necessary and appropriate.

Dated: October 28, 2021

Respectfully submitted,

/s/ Damaris Hernandez

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**CERTIFICATE OF SERVICE**

I, Sharon K. Robertson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: October 28, 2021

/s/ Sharon K. Robertson  
Sharon K. Robertson